

REMARKS

By this Amendment, Applicant has amended claims 1 and 19. Further, claims 21-23 have been cancelled without prejudice or disclaimer. Applicant submits that no new matter has been introduced. Claims 1, 2, 4, 5, 7-20, 24 and 25 are pending, of which claims 17, 18, 24 and 25 are withdrawn from consideration. Reconsideration and allowance of the pending claims, in view of the following remarks, are respectfully requested.

Entry of the Amendment is proper under 37 C.F.R. §1.116 as the amendments: (a) place the application in condition for allowance for the reasons discussed herein; (b) do not present any additional claims without canceling a corresponding number of claims; (c) place the application in better form for appeal, should an appeal be necessary; and (d) were not made earlier because they are made in response to the points first presented in the final Office Action. Entry of the Amendment is thus respectfully requested along with withdrawal of the final Office Action.

Claims 1, 2, 4, 6-16, 19 and 20 stand rejected under 35 U.S.C. §102(b) as allegedly being anticipated by Chitayat '651 (U.S. Patent No. 4,985,651).

Claim 6 was cancelled in the Amendment filed May 17, 2006 and so its rejection is moot.

Applicant respectfully submits that the cited portions of Chitayat '651 fail to disclose, teach or suggest a system for carrying and moving an object in a plane, comprising, *inter alia*, a first and a second linear actuator configured to support said object carrier and move said object carrier in a first direction, said first and second linear actuators extending in parallel along said first direction, said first and second linear actuators being electromagnetic linear actuators comprising: (i) a magnetic structure, and (ii) a coil structure, wherein the coil structure and the magnetic structure are positioned relative to each other and separated by an air bearing that is adapted to support said object carrier; and a third and a fourth linear actuator configured to move said object carrier in a second direction, said third and fourth linear actuators extending in parallel along said second direction, wherein both the coil structure and the magnetic structure of the first and second linear actuators are moveable with respect to each other or both a coil structure and a magnetic structure of the third and fourth linear actuators are moveable with respect to each other, the coil structure or the magnetic structure of the respective pair of coil structure and magnetic structure of the respective linear

actuator configured as a balance mass to receive reaction forces arising from the movement of the other of the coil structure or the magnetic structure as recited in claim 1. Similarly, Applicant respectfully submits that the cited portions of Chitayat '651 fail to disclose, teach or suggest a method for carrying and moving an object in a plane, comprising, *inter alia*, an object carrier being moveable by a first and a second linear actuator in a first direction and by a third and a fourth linear actuator in a second direction, said first and second linear actuators being adapted to support said object carrier by having a coil structure and a magnetic structure that are separated by an air bearing that is adapted to support said object carrier, wherein both the coil structure and the magnetic structure of the first and second linear actuators are moveable with respect to each other or both a coil structure and a magnetic structure of the third and fourth linear actuators are moveable with respect to each other, the coil structure or the magnetic structure of the respective pair of coil structure and magnetic structure of the respective linear actuator configured as a balance mass to receive reaction forces arising from the movement of the other of the coil structure or the magnetic structure as recited in claim 19.

The cited portions of Chitayat '651 fail to disclose, teach or suggest both a coil structure and magnetic structure of an actuator that are moveable with respect to each other as claimed. Therefore, claims 1 and 19 are patentable over Chitayat '651.

Claims 2, 4 and 7-16 depend from claim 1 and are patentable for at least the same reasons provided above related to claim 1, and for the additional features recited therein. Claim 20 depends from claim 19 and is patentable for at least the same reasons provided above related to claim 19, and for the additional features recited therein.

Accordingly, reconsideration and withdrawal of the rejection of claims 1-4, 9-16 and 19-20 under 35 U.S.C. §102(b) based on Chitayat '651 are respectfully requested.

Further, claims 5, 7 and 8 stand rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Chitayat '651 in view of Chitayat '266 (U.S. Patent No. 5,519,266)

Claims 5, 7 and 8 depend from claim 1 and are patentable over Chitayat '651 for at least the same reasons provided above related to claim 1, and for the additional features recited therein.

Further, Chitayat '266 fails to overcome the deficiencies of Chitayat '651. The cited portions of Chitayat '266 fail to disclose, teach or suggest both a coil structure and magnetic structure of an actuator that are moveable with respect to each other as claimed. Therefore, claim 1 is patentable over Chitayat '266. Claims 5, 7 and 8 depend from claim 1 and are

therefore patentable over Chitayat '266 alone or in combination with Chitayat '651 for at least the same reasons provided above related to claim 1, and for the additional features recited therein.

Accordingly, reconsideration and withdrawal of the rejection of claims 5, 7 and 8 under 35 U.S.C. §103(a) based on Chitayat '651 in view of Chitayat '266 are respectfully requested.

Claim 21 stands rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Chitayat '651 in view of Kyomansu (U.S. Patent No. 6,727,666) and claims 22 and 23 stand rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Chitayat '651 in view of Kyomansu and Kwan (U.S. Patent No. 6,635,887).

Claims 21-23 have been cancelled without prejudice or disclaimer. Therefore, the rejection of claim 21 over Chitayat '651 in view of Kyomansu and claims 22 and 23 over Chitayat '651 in view of Kyomansu and Kwan is now moot.

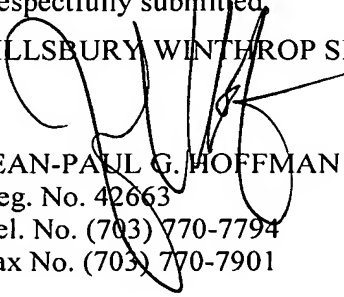
In view of the above amendments and remarks, it is respectfully submitted that all of the claims are allowable and the entire application is in condition for allowance.

Should the Examiner believe that anything further is desirable to place the application in better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Please charge any fees associated with the submission of this paper to Deposit Account Number 033975. The Commissioner for Patents is also authorized to credit any over payments to the above-referenced Deposit Account.

Respectfully submitted,

PILLSBURY WINTHROP SHAW PITTMAN LLP


JEAN-PAUL G. HOFFMAN
Reg. No. 42663
Tel. No. (703) 770-7794
Fax No. (703) 770-7901

P.O. Box 10500
McLean, VA 22102
(703) 770-7900